

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: HAYDEL PROPERTIES, L.P.

CHAPTER 11
CASE NO. 12-50048-KMS

THE PEOPLES BANK, BILOXI MISSISSIPPI'S OBJECTION TO
CONFIRMATION OF PLAN OF REORGANIZATION

COMES NOW The Peoples Bank, Biloxi Mississippi, and files this its Objection to Debtor's Amended Plan of Reorganization [Dkt. #385], and in opposition to said Plan, shows unto the Court that: (1) the Plan does not treat the Bank fairly and equitably as required by 11 U.S.C. § 1129(b)(2);; and (2) Debtors have failed to provide supplemental information as mandated by this Court in its Order Approving Disclosure Statement [Dkt #433] entered June 7, 2013; the Plan is incapable of being confirmed due to Debtor's default as it is too vague and speculative; (3) the Plan imposes undue burdens upon the Bank in the event of default; and (4) other infirmities which will be demonstrated at the Hearing.

WHEREFORE, premises considered, The Peoples Bank, Biloxi Mississippi objects to confirmation of the Debtor's Amended Plan of Reorganization.

Respectfully submitted, this the 18th day of July, 2013.

THE PEOPLES BANK, BILOXI MISSISSIPPI

BY: PAGE, MANNINO, PERESICH,
& McDERMOTT, P.L.L.C.

BY: /s/ Les W. Smith
Les W. Smith, MSB #9659

PAGE, MANNINO, PERESICH
& McDERMOTT, P.L.L.C.
759 Vieux Marche
P. O. Drawer 289
Biloxi, MS 39533
Telephone No. (228) 374-2100
Facsimile No. (228) 432-5539

CERTIFICATE

I, LES W. SMITH, of the law firm of Page, Mannino, Peresich & McDermott, P.L.L.C., do hereby certify that the following have been served electronically via ECF with a copy of the above THE PEOPLES BANK, BILOXI MISSISSIPPI'S OBJECTION TO CONFIRMATION OF PLAN OF REORGANIZATION to the following:

Robert Alan Byrd
rab@byrdwiser.com
wrs@byrdwiser.com

Michael L. Fondren
mlfondren@hotmail.com
kdcp51@hotmail.com

Robert Gambrell
rg@ms-bankruptcy.com
ecf@ms-bankruptcy.com
rgecfile@gmail.com

Laura Ann Henderson-Courtney
lhc@underwoodlawfirm.com
lhend@aol.com
bankruptcies@underwoodlawfirm.com
scott@underwoodlawfirm.com
tiffani@underwoodlawfirm.com

Patrick A. Sheehan
pat@sheehanlawfirm.com
tammy@sheehanlawfirm.com
brittany@gulfcoastlawyer.com
lisa@gulfcoastlawyer.com

Christopher James Steiskal
Christopher.J.Steiskal@usdoj.gov

United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

William P. Wessler
wwessler@cableone.net

and via U.S. Mail to the following:

Alfonso Realty, Inc.
dba Coldwell Bank Alfonso Realty
625 Courthouse Road
Gulfport, MS 39507

Cameron Bell
Cameron Bell Properties, Inc.
1285 Spring Street, Suite B
Gulfport, MS 39507

Mark Cumbest
1725 Hwy 63
Moss Point, MS 39562

Jackson County Tax Collector
P.O. Box 998
Pascagoula, MS 39568

Kenneth Jones
Coldwell Banker Commercial Alfonso Realty
625 Courthouse Road
Gulfport, MS 39507

M. Andrew McDonald
P O Box 661
Gulfport, MS 39502-0661

Terry Miller
Chancery Clerk Jackson County
Post Office Box 998
Pascagoula, MS 39568-0998

Mark Orglar
P. O. Box 2408
Gulfport, MS 39505-2408

Sherry Owen
2208 18th St., Ste. D
Gulfport, MS 39501

So certified, this the 18th day of July, 2013.

/s/ Les W. Smith
LES W. SMITH

PAGE, MANNINO, PERESICH
& MCDERMOTT, P.L.L.C.
759 Vieux Marche
P. O. Drawer 289
Biloxi, MS 39533
Telephone No. (228) 374-2100
Facsimile No. (228) 432-5539